

EXHIBIT

122

COPY

1

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 SHAW FAMILY ARCHIVES, LTD.,
5 EDITH MARCUS, and META STEVENS

6 Plaintiffs,

7 - against -

8 CMG WORLDWIDE, Inc., an Indiana
9 corporation, and MARILYN MONROE,
Limited, a Delaware limited
liability company,

10 Defendants.

11 -----x

12 Ellen Grauer Court Reporters
13 126 East 56th Street
14 New York, New York

15

16 December 26, 2007
17 12:01 p.m.

18

19 30(b)(6) deposition of MARK
20 ROESLER, before Marlene Lee, CSR, CRR, a Notary
Public of the State of New York.

21

22

23 ELLEN GRAUER COURT REPORTING CO. LLC
24 126 East 56th Street, Fifth Floor
25 New York, New York
212-750-6434
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1 ROESLER

2 Q. That's your signature on page 1?

3 A. It is.

4 Q. Dated May 2nd, 1995; correct?

5 A. Yes.

6 Q. What was the gist of what you were
7 trying to say in the first page of this
8 document to Ms. Strasberg?

9 MS. COLBATH: Objection.

10 A. I don't -- I don't recall. I don't
11 know what --

12 Q. If you could just read the first
13 page to yourself. Maybe it will refresh your
14 recollection.

15 MR. MINCH: I'm sorry. What
16 page --

17 A. You're asking what the recent legal
18 victory on the West Coast was?

19 Q. I'm just asking you to read the
20 cover page, this letter that you sent to
21 Ms. Strasberg, and tell me what the purpose of
22 this letter was.

23 A. Well, it was right before -- we
24 started representing the -- officially
25 representing the estate 90 days later, so it

1 ROESLER

2 was probably in our lead-up to representing --

3 Q. It says in the second paragraph,
4 "In a follow-up to my recent letters and
5 correspondence to you and my meetings a few
6 days ago with Mr. Seidman and Mr. Starr, I have
7 enclosed a brief summary of our position." Do
8 you see that?

9 A. Yes.

10 Q. By the way, is that the Ken Starr
11 that you are referring to there? It says "Ken
12 Starr" on the bottom of the page, cc'd.

13 A. What do you mean, "the Ken Starr"?

14 Q. Kenneth Starr.

15 A. You mean the one on the news a lot?

16 Q. Yes.

17 A. It's a different Ken Starr. But a
18 lot of people get him confused. He's a well
19 known financial adviser in New York.

20 MS. COLBATH: He thinks he's the
21 Ken Starr.

22 Q. When you say, "I have enclosed a
23 brief summary of our position," what did you
24 mean?

25 A. I guess it's what's right here,